

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347

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(302) 658-9200
(302) 658-3989 FAX

SUSAN W. WAESCO
(302) 351-9677
(302) 425-3088 FAX
swesco@morrisnichols.com

August 13, 2025

SUBMITTED VIA E-FILE

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corporation (“CITGO”) regarding the sealed version of the Venezuela Parties’ Reply in Support of Notice of Objections to the Special Master’s Final Recommendation (“Reply Brief”), the Second Supplemental Declaration of Nathan P. Eimer, and the supporting exhibits submitted contemporaneously to the Court today.

In accordance with the Court’s July 14 Order, CITGO and PDVH conferred with the Special Master regarding his position on the confidentiality of material in the Venezuela Parties’ filings. The Special Master’s counsel provided guidance on what information should be withheld from public filing, and CITGO and PDVH have “compl[ied] with the Special Master’s directives regarding” the same. *Id.* Broadly speaking, these redactions are intended to redact bidder identities, bid amounts, and correspondence about the sale process produced in discovery or otherwise exchanged with Sale Process Parties that have not otherwise been publicly filed. CITGO and PDVH take no position on whether these materials should remain partially sealed at this time, but expect that the Special Master’s forthcoming status report on hearing procedures (to be filed on August 15, 2025 (D.I. 2028)) will address the procedure for the use of sealed information at the public Sale Hearing.

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Separately, redactions in the Reply Brief and the Reply Expert Report of Dr. José Alberro (Eimer Ex. 57) cover CITGO and/or PDVH's highly confidential and competitively sensitive financial or business information.

Consistent with the Court's July 14 Order, CITGO and PDVH have served unredacted versions of today's filings on parties to this case that have executed the confidentiality agreement at D.I. 1555-1.

Respectfully,

/s/ Susan W. Waesco

Susan W. Waesco (#4476)